

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

**SNL WORKFORCE FREEDOM  
ALLIANCE, *et al.*,**

Plaintiffs,

v.

**NATIONAL TECHNOLOGY AND  
ENGINEERING SOLUTIONS OF  
SANDIA LLC d/b/a SANDIA NAT'L  
LABORATORIES, *et al.*,**  
Defendants.

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Case No. 1:22-cv-00001-KWR-SCY

**DECLARATION OF MARY ANN  
MONSON IN SUPPORT OF  
NATIONAL TECHNOLOGY AND  
ENGINEERING SOLUTIONS OF  
SANDIA, LLC'S OPPOSITION TO  
MOTION FOR TEMPORARY  
RESTRAINING ORDER**

**DECLARATION OF MARY ANN MONSON**

I, Mary Ann Monson, hereby declare:

1. I am the Senior Manager, Business Development for National Technology and Engineering Solutions of Sandia, LLC ("NTESS"). I make this declaration in support of NTESS's Opposition to Plaintiffs' Motion for Temporary Restraining Order. The facts set forth in this declaration I know to be true of my own personal knowledge and upon information and belief. If called to testify in this matter, I could and would competently testify to the matters set forth in this declaration.


2. I have held the position of Senior Manager, Technology Partnerships and Business Development for approximately 5 years. In this role, I am responsible in part for providing business development support to programs and fostering strategic partnerships to support mission objectives, leveraging Sandia's technologies, facilities and people to create technology-based economic development and open collaboration and executing processes that enable our internal customers to transact technology transfer efficiently with external customers.

3. The State of New Mexico neither directs nor influences the operations at SNL, but SNL does from time-to-time enter into contracts with New Mexico to perform services or partners with New Mexico on certain projects, including the SafeGraph contact tracing project the Plaintiffs referenced in their complaint.

4. During the pandemic, the Department of Energy Office of Technology Transitions (OTT) implemented a COVID Technical Assistance Program (CTAP) that permitted DOE National Laboratories, like Sandia, to apply for and receive funds for supporting COVID-19 related projects (limited to 40 hours of work). Eligibility for CTAP was limited to projects providing COVID-19 related technical assistance to U.S. Entities, defined as entities that are not subject to foreign majority control.

5. NTESS applied for and secured CTAP funds to partner with the State of New Mexico on a COVID-19 related project. In that project, NTESS analyzed mobility data to determine the contribution of travel to COVID spread within New Mexico. The funding and authorization for the project came from the DOE OTT under CTAP, not from the State of New Mexico.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 11, 2022.

  
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**Mary Ann Monson**